

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION**

TYLER TECHNOLOGIES, INC.,)
)
Plaintiff,)
)
v.)
)
LEXUR ENTERPRISES INC., ROBERT FRY,)
AND DANIEL MUTHARD,)
)
Defendants.)
)

Case No. 20-cv-00173-TWP-DML

**JOINT MOTION TO EXTEND TYLER TECHNOLOGIES, INC.’S DEADLINE
TO RESPOND TO DEFENDANTS’ MOTIONS FOR MORE DEFINITE STATEMENT**

Plaintiff Tyler Technologies, Inc. (“Tyler”) and Defendants Lexur Enterprises Inc. (“Lexur”), Robert Fry, and Daniel Muthard (collectively, the “Defendants”) jointly move the Court to extend Tyler’s deadline to respond to (1) Lexur’s Motion for More Definite Statement to Assess the Court’s Jurisdiction over Plaintiff’s Claims (DE #101) and (2) Mr. Fry and Mr. Muthard’s Motion for More Definite Statement to Assess the Court’s Jurisdiction Over Plaintiff’s Claims (DE #103–104) (collectively, the “Motions for More Definite Statement”). In support of this joint motion, the Parties state as follows:

1. Defendants filed the Motions for More Definite Statement on August 2, 2021.
2. The current deadline for Tyler to respond to the Motions for More Definite Statement is August 23, 2021.
3. The Parties jointly request the deadline for Tyler to respond to the Motions for More Definite Statement be extended by three weeks to September 13, 2021.
4. There is good cause for this joint motion. The additional time is required to prepare a response to the Motions for More Definite Statement, and to allow time for the Parties to continue

discussions concerning a potential settlement of this matter before any response is filed.

5. This is the first request to extend the deadline for Tyler to respond to the Motions for More Definite Statement. No Party will be prejudiced by the requested extension, this request is not made for the purpose of delay or any other improper purpose, and the cause of justice will be served.

WHEREFORE, the Parties respectfully request that the Court grant this joint motion, extend Tyler's deadline to respond to the Motions for More Definite Statement by three weeks to September 13, 2021, and grant any other relief deemed appropriate by the Court.

Respectfully submitted,

Vivek R. Hadley

Jennifer J. Nagle (*pro hac vice*)
Michael R. Creta (*pro hac vice*)
K&L Gates LLP
State Street Financial Center
One Lincoln Street
Boston, MA 02111
Tel: 617-261-3100
Fax: 617-261-3175
jennifer.nagle@klgates.com
michael.creta@klgates.com

Ann O'Connor McCready
Vivek R. Hadley
Taft Stettinius & Hollister LLP
One Indiana Square
Suite 3500
Indianapolis, IN 46204
Tel: 317-713-3500
Fax: 317-713-3699
amccready@taftlaw.com
vhadley@taftlaw.com

Counsel for Plaintiff Tyler Technologies, Inc.

A. Richard M. Blaiklock

A. Richard M. Blaiklock
Aaron D. Grant
John Carl Trimble
Lewis Wagner, LLP
1411 Roosevelt Avenue
Suite 102
Indianapolis, IN 46201
Tel: 317-237-0500
Fax: 317-630-2790
rblaiklock@lewiswagner.com
agrant@lewiswagner.com
jtrimble@lewiswagner.com

Counsel for Lexur Enterprises Inc.

Douglas B. Bates

Douglas B. Bates
Chelsea R. Stanley
Stites & Harbison, PLLC
323 East Court Avenue
Jeffersonville, IN 47130
Tel: 812-282-7566
Fax: 812-284-5519
dbates@stites.com
cstanley@stites.com

Counsel for Robert Fry and Daniel Muthard

DATED: August 17, 2021

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2021, a copy of the foregoing document titled ***Joint Motion to Extend Tyler Technologies, Inc.'s Deadline to Respond to Defendants' Motions for More Definite Statement*** was filed via CM/ECF and served on all counsel of record.

/s/ Vivek R. Hadley